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417th BSB (Kitzingen)

***HAZARDOUS MATERIAL AND HAZARDOUS WASTE
MANAGEMENT PLAN***

Prepared by the 417th BSB DPW Environmental Management Office
Reviewed by the 417th BSB Hazardous Waste Management Board

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1. Purpose and Applicability

a. Purpose

The purpose of this plan is to establish responsibilities and procedures regarding handling, treatment, storage and disposal of hazardous materials (HM) and hazardous wastes (HW) within the 417th Base Support Battalion (Kitzingen) to comply with the applicable sections of Army and USAREUR and IMA-EUROPE guidance/regulations/policy, U.S. law, and the requirements of German law, as defined by the NATO Status of Forces Agreement (SOFA). This plan will be used until the project to prepare a plan IAW the IMA-EUROPE template has been completed (KTV-0503-3).

b. Applicability

This directive applies to all assigned, attached, and tenant units/separate activities receiving logistic or facility support from the 417th BSB that handle, store, use, or dispose of HM or generate HW.

c. Exclusions

Items specifically excluded from this plan include chemical warfare agents, which are covered in AR 385-61; explosive ordnance and ammunition (EOD waste to include solid-fuel rocket motors), which are covered in the AR 75 and 755 series; radioactive material/waste, which is the responsibility of the local Preventive Medicine Services (PMS) or unit/division Radiation Protection Officer (RPO); and infectious medical waste, which is managed by contract obtained through 7th MEDCOM.

d. Authority

This plan is a condensed update of the ASG Hazardous Waste Management Plan (HWMP) of April 1996 with applicability only for the area of the 417th BSB. This version updates the original from 12 Jan 01.

e. Proponent: 417th BSB Directorate of Public Works (DPW).

2. Definitions and Abbreviations

DRMO: Defense Reutilization and Marketing Office. DRMOs come under the authority of DRMS International. DRMOs serve as disposal points for HM/HW. They are CORs for HW disposal contracts and schedule HW removal from the BSB via German contractors.

DRMS-International: Defense Reutilization and Marketing Service-International. Higher headquarters for DRMOs in Europe and contracting office for all HW direct removal and disposal contracts.

Environmental Management Office (EMO): The EMO is part of the Directorate of Public Works (DPW), with the responsibility for HW management and other US Army environmental programs.

Hazardous Material (HM). Any element, compound or mixture, when handled / discharged in sufficient quantity, presents substantial danger to personal / public health or environmental quality.

Hazardous Waste (HW): Substances defined by U.S. law or German law as hazardous materials or contaminated by hazardous materials, that are no longer needed by the user or are unsuitable for the purpose for which they were manufactured.

Hazardous Waste Management Board (HWMB): Subcommittee of the Environmental Quality Control Committee (EQCC). Deals with issues relating to storage, handling, and disposal of HM/HW.

Hazardous Waste Profile Sheet (HWPS): Waste composition information required by DRMO for turn-in of HW for disposal. Must be prepared and signed by the HW generator or the DPW EMO, and provided to the DRMO-COR before disposal of the HW can occur.

Serviceable Material: Includes any item that can still be used for its intended purpose. HM in this category includes those containers in good condition with an expiration date (or any extensions) that has not passed.

Standortverwaltung (STOV): At Giebelstadt Army Airfield the German "Bundeswehr" administration is responsible (by contract) for providing HW disposal services. They provide containers for collection of large waste streams at the motorpools and a central HW collection area for disposal of all other HW. Collection / separation requirements are very similar to the rest of the BSB.

Unserviceable Material: Any item that has become mixed with unwanted contaminants, any leaking item, or any item with original packaging deteriorated to the point of possible rupture (e.g. dented or rusted). Also, any item that has passed the expiration date marked on the container for which its serviceable life cannot be extended on the basis of testing or recertification through the supply system.

3. Responsibilities

a. Base Support Battalion Commander

(1) Has overall responsibility for the HM/HW management program within the BSB and ensures that all personnel and facilities for which this plan is applicable comply with U.S. and HN regulatory requirements.

(2) Ensures that sufficient resources are made available to execute environmental HM/HW programs.

(3) Ensures implementation of the Hazardous Waste Management Plan, including appointment of a Hazardous Waste Manager, who is responsible for the day-to-day management of hazardous wastes.

(4) Establishes a BSB Environmental Quality Control Committee (EQCC) and a Hazardous Waste Management Board (HWMB) where HM/HW management issues are discussed.

b. BSB Director of Public Works

(1) Serves as the BSB Commander's primary representative for implementation of the BSB hazardous waste management program.

(2) Identifies and budgets for BSB HM/HW requirements, including HW disposal.

(3) Provides technical assistance, training, and guidance to BSB HW generators and HM/HW handlers.

c. Staff Judge Advocate (SJA) of 1st Infantry Division

(1) Serves as a member of the HWMB

(2) Advises the HWMB regarding legal implications of improper handling, storage, and disposal of HM/HW.

d. Hazardous Waste Generators

(1) Prepare and update a (HM/HW) SOP that defines responsibilities and proper procedures for HM/HW handling, storage, disposal, and spill response/notification IAW **Appendix A**, and this plan.

(2) Appoint a unit Environmental Coordinator/Hazardous Waste Collection Point Manager (on orders) to oversee compliance with HM/HW environmental requirements.

- (3) Maintain the security and integrity of HW collection areas and containers.
- (4) Ensure proper identification of HW types generated. Help the EMO to prepare HW Profile Sheets for HWs generated by the unit.
- (5) Ensure proper accumulation / separation of HW in each container or underground tank.
- (6) Ensure personnel utilizing the HW accumulation point understand the operating procedures.
- (7) Prevent and clean-up spills immediately.
- (8) Notify the DPW EMO of any new HW requirements (number of containers, missing labels, repair of containers or tanks, filled or overflowing containers, etc.). (See POCs, **Appendix B.**)
- (9) Maintain security and integrity of all HM storage areas and containers.
- (10) Maintain a current inventory of all HM stored by unit and have an MSDS on file for each HM stored.
- (11) Separate incompatible materials IAW the hazard classification of the MSDS.
- (12) Rotate HM stocks, separate HM stocks that are past the test date, initiate and document actions to extend shelf life of expired materials, or turn the materials in to the 98th ASG DOL Reuse Center for extension and redistribution. (See POCs, **Appendix B.**)
- (13) Return excess materials before expiration to the supporting supply activity, or turn them in to the 98th ASG DOL Reuse Center for redistribution.
- (14) Coordinate with the DPW EMO and the DRMO on the disposal or sale of large stocks of unserviceable materials, that cannot be extended or turned in to the Reuse Center. (See POCs, **Appendix B.**)
- (15) Support and initiate Pollution Prevention initiatives (e.g. to replace HM with non-hazardous substitutes, reduce use of HM, reduce generation of HW).
- (16) Send a representative to the BSB HWMB to discuss problems, new requirements, and recommend actions to improve the management of HM and HW.
- (17) Send personnel working at a unit HW accumulation point to the BSB Hazardous Waste Training or arrange for unit training with the EMO. Keep records of the participation.

e. BSB DPW Hazardous Waste Manager

(1) The BSB Hazardous Waste Manager is appointed by the BSB Commander and is normally located in the DPW EMO.

(2) Is the primary POC for all HW generators for technical assistance, training, and guidance. He/she determines HW contract requirements needed to support the BSB's environmental management program and participates in the statement of work development.

(3) Submits pickup requests identifying types and quantities of HW generations and removal frequencies, and notifies the DRMO COR of any required changes.

(4) Determines the number, location, and relocation of containers needed to meet installation requirements and notifies the DRMO COR of any changes.

(5) Prepares the necessary forms 1348-1 (HW services), prepares and consolidates the hazardous waste profile sheets, and provides them to the DRMO COR.

(6) Conducts regular quarterly HW training for HW generators within 417th BSB about the proper handling of HW and other program requirements.

(7) Coordinates the HW removal schedule and other contracted services with the DRMO COR and consolidates amounts and types of HW that must be removed from HW accumulation points.

(8) Maintains records and files on all HW removal actions and other HW program requirements.

(9) Notifies in writing the DRMO COR of ways to improve the management and collection of HW and of any problems with the HW contractor.

(10) Maintains an inventory of all HW accumulation points and HM storage areas and updates the inventory annually.

(11) Coordinates the BSB HWMB meetings and reports the results of the HWMB to the BSB EQCC.

(12) Monitors / inspects HW accumulation points and other BSB facilities for compliance with HM and HW regulatory requirements. The inspection checklist is at **Appendix C**.

(13) Prepares required reports for USAREUR, and requests funds for the HW disposal requirements thru the budget of the EMO.

(14) Updates the BSB HM/HW Management Plan annually.

f. BSB Safety Office

(1) Provides assistance, training, and guidance to BSB HW generators and HM/HW handlers on all safety issues.

(2) Is the primary POC within this BSB for all issues regarding transportation of hazardous materials and hazardous wastes.

(3) Is a member of the BSB HWMB.

g. BSB Hazardous Waste Management Board (HWMB)

(1) The BSB HWMB consists of all activities storing hazardous materials, generating / disposing of hazardous waste and related BSB support organizations. DRMO, as principal agency responsible for BSB hazardous waste disposal contracts management, is included as a member. The BSB DPW Hazardous Waste Manager is the board "moderator".

(2) The HWMB deals with issues relating to storage, handling, and disposal of HM/HW. It discusses problems, new requirements and recommendations to improve the management of HM/HW.

(3) The HWMB meets quarterly, but at least twice a year.

4. HW Disposal Requirements

a. Unit HW Accumulation Points

- (1) Unit HW accumulation points will be used to collect large waste streams of HW.
- (2) HW will be collected separately in accordance with the requirements of the HW transportation firms and the disposal / recycling facilities under contract. The requirements for separation are listed at **Appendix A**.
- (3) Containers for proper collection and storage, labels, and the disposal services will be provided thru DRMO direct removal contracts (or STOV in Giebelstadt).
- (4) The removal of HW and other requirements (e.g. for containers) will be scheduled thru the DPW EMO (or STOV in Giebelstadt).
- (5) HW generators will ensure proper collection and safety of HW accumulation points.

b. Central HW Collection Areas

- (1) The central HW collection point at Harvey Barracks can be used by all units of the 417th BSB (including units from Giebelstadt) for those HW materials that cannot be disposed at unit HW accumulation points. The turn in of HW will be coordinated with the DPW EMO. Hazardous waste materials that can be turned in are listed at **Appendix D**.
- (2) Units from Giebelstadt Army Airfield should use the central HW collection point of STOV Giebelstadt. The turn in of HW will be coordinated with the STOV at Giebelstadt.

5. HM Handling, HW Minimization, and Pollution Prevention Requirements

a. Identification of HM for Disposal

Only unserviceable HM that cannot be reused will be disposed as HW:

- The material cannot be returned to the Supply Activity,
- The Reuse Center Conn Barracks, Schweinfurt cannot accept it,
- DRMO cannot sell it, and
- No other unit can use it.

b. 98 ASG DOL Hazardous Material Collection & Reuse Center, Schweinfurt

All units of the 417th BSB (Kitzingen) must use the Reuse Center (See POCs **Appendix B**) to minimize generation of hazardous wastes:

(1) All hazardous materials in good condition (original, unopened cans, and other serviceable materials) that are excess materials must be offered to the Reuse Center for redistribution.

(2) Before ordering new materials, the stocks of the Reuse Center must be checked. Available stocks will be issued at no cost to the unit. (See stock list internet address at **Appendix B**.)

c. HM Handling and Storage Requirements

(1) Units will maintain a current inventory of all HM stored.

(2) Material Safety Data Sheets (MSDS) will be kept on file for each HM stored.

(3) All materials will be stored and separated IAW the hazard classification and guidance of the MSDS.

(4) HM storage facilities will be kept secured, clean and orderly.

(5) All HM storage containers must be clearly labeled, free of dents, rust, corrosion or other defects.

(6) The disposal of full or partially full containers of serviceable materials is prohibited. Containers will be kept closed unless dispensing HM for immediate use.

(7) HM stocks must be rotated. HMs with the least remaining shelf life must be accessible. HM stocks that are past the test date must have documented shelf life extensions. Materials without documented shelf life extensions must be cordoned off and marked.

(8) Units will consolidate and centralize HM storage facilities as far as practicable. HM storage facilities for water endangering liquids (e.g. oil, solvents, thinner) will have secondary containment to prevent any pollution of water or soil.

(9) Repair and upgrade of inadequate HM storage facilities will be coordinated and programmed thru the DPW EMO.

d. Spill Prevention and Clean up Requirements

(1) Units storing hazardous materials that pose a hazard to water or soil must have a spill plan / SOP on file.

(2) Emergency phone numbers must be posted at telephones and personnel must be trained in proper notification procedures. POCs are listed at **Appendix B**.

(3) Absorbent materials for the specific hazardous materials used, sufficient quantities for spill clean up, and equipment must be available at or nearby each handling or storage area for HM/HW.

(4) Personnel must be trained in proper spill clean up procedures and spills must be cleaned up immediately.

6. HM/HW Transportation Requirements

The transportation of HW must comply with applicable US Army Regulations, especially USAREUR 55-4, and with the European Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR). Guidance on how to comply with this regulation may be obtained from the BSB Safety Office, Mr. Dengler (Hazardous Cargo Specialist). (See POCs at **Appendix B.**)

7. HW Training Requirements

a. IMA-EUROPE conducts annually basic courses for Unit Environmental Coordinators at the 417th BSB. These courses are required for Unit Hazardous Waste Managers. The EMO must be contacted to schedule for attendance. Refresher courses will be offered by EMO quarterly. Special unit HM/HW training will also be provided upon request of HW generators.

b. HW generators will ensure that all persons that handle or dispose of HM/HW have adequate training.

8. Funding of HW Disposal Requirements

a. The DPW EMO will request funding of HW disposal requirements thru the annual budget process.

b. The DPW Utilities Division and Facilities Engineer in Kitzingen will request funding for regular trash and household HW disposal services thru their annual budget process.

c. Tenants, non-USAREUR units, DECA, DODDS, Hospital units, etc. can be asked for reimbursement of hazardous waste disposal costs, if the costs cannot be paid from the annual DPW budget for hazardous waste disposal.

d. STOV will request funding for hazardous waste disposal costs from DPW IAW the Giebelstadt Agreement Contract.

9. Inspections

1. Inspections of the HW accumulation points will be conducted by the BSB HW Manager on a regular basis to ensure HW is properly segregated. Notifications of improper segregation will be sent to units that do not comply with the provisions of this plan, and especially **Appendix A.**

2. Annual assessments of unit HM/HW activities, including spill prevention, safety, fire protection and SORT issues, will be conducted by the DPW EMO according to Final Governing Standards (ECAS). Records of assessments will be kept. **Appendix C** will be used for this type of inspections.
3. Every 3 years an Environmental Compliance Assessment System (ECAS) inspection will be conducted by IMA-EUROPE. The ECAS assessments are based on the Final Governing Standards (FGS), DOD/DA/USAREUR policy and host nation requirements.